

**CYRO Industries
York County
Sanford, Maine
A-393-71-S-M**

**Departmental
Findings of Fact and Order
Air Emission License
Amendment #7**

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

1. CYRO Industries (CYRO) of Sanford, Maine was issued Air Emission License A-393-72-A-R on April 17, 1998 permitting the operation of emission sources associated with their acrylic sheet manufacturing facility. The license was subsequently amended on December 15, 1998 (A-393-71-J-M), May 3, 2000 (A-393-71-K-M), July 10, 2000 (A-393-71-N-M), May 25, 2001 (A-393-71-P-M), August 23, 2001 (A-393-71-Q-M), and June 24, 2002 (A-393-71-R-M).
2. CYRO has requested a minor revision to their license in order to include their laser cutting process as a significant activity.

B. Revision Description

In Air Emission License A-393-71-Q-M, CYRO licensed the addition of a laser cutting process. At that time CYRO accepted an emission limit of 390 lb/year of Methyl Methacrylate (MMA) from the laser cutting operation before control. With these emission rates the laser cutting process is considered an insignificant activity.

The emissions from the laser cutting process are controlled by a carbon adsorption unit with a guaranteed control efficiency of 99%.

CYRO's use of the laser cutting process has exceeded forecasts causing the 12-month rolling total emissions to approach the 390 lb/year cap. Therefore, CYRO has requested a minor revision to their air emission license to include the process for cutting plastic sheet using a laser as a significant source of emissions of MMA. CYRO has not requested any increase in the licensed annual emission rate of MMA.

Since this operation was previously considered an insignificant activity, Best Practical Treatment (BPT) was never applied. In order to include the laser cutting process as a significant activity BPT must be addressed.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in Chapter 100 of the Air Regulations. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

BACT for the laser cutting operation is determined to be the operation and maintenance of the carbon adsorption unit for control of MMA.

C. Application Classification

This amendment will not increase permitted emissions for any regulated pollutant. Therefore, this modification is determined to be a minor revision and has been processed as such.

ORDER

The Department hereby grants Air Emission License Minor Revision A-393-71-S-M, subject to the conditions found in Air Emission License A-393-72-A-R, in the following amendments: A-393-71-J-M, A-393-71-K-M, A-393-71-N-M, A-393-71-P-M, A-393-71-Q-M, A-393-71-R-M and in addition to the following conditions:

The following shall replace Condition (44) of Air Emission License A-393-71-Q-M:

(44) Laser Cutting Process

- A. CYRO shall keep records on a monthly basis of the estimated MMA emissions from the laser cutting operation after control.
- B. CYRO shall keep records of the operating hours and the maintenance performed on the carbon unit for the laser cutting process.

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3

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(16) This amendment shall expire concurrently with Air Emission License A-393-72-A-R.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2003.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAWN R. GALLAGHER, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 2/21/03

Date of application acceptance: 2/25/03

Date filed with the Board of Environmental Protection: _____

This Order prepared by Lynn Ross, Bureau of Air Quality.